



United States
Department of
Agriculture

Food and
Nutrition
Service

Mountain Plains
Region

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REPLY TO

ATTN OF: SP 99- 15

SUBJECT: Nutrition Reviews of Residential Child Care Institutions

TO: STATE AGENCY DIRECTORS -
(Child Nutrition Programs)

Colorado ED, Iowa,
Kansas, Missouri ED,
Montana OPI, Nebraska,
North Dakota, South
Dakota, Utah,
Wyoming ED

Section 210.10(a) of the National School Lunch Program (NSLP) Regulations and Section 220.8(a) of the School Breakfast Program regulations require reimbursable school lunches and breakfasts to meet specific nutrition standards over a school week. To ensure compliance with these standards, Section 210.19(a) requires State agencies (SAs) to evaluate each school food authority's (SFA) food service at least once every five years. As part of this evaluation, the SA must conduct a nutrient analysis of the food service, or, if the school is using Nutrient Standard Menu Planning to plan and prepare its meals, an assessment of the SFA's application of the appropriate methodology.

These basic requirements apply to all SFAs and schools, including Residential Child Care Institutions (RCCIs). Nevertheless, we are aware that food service operations in RCCIs can be quite different from those encountered in more traditional school settings. For example, RCCIs are frequently very small entities and experience significant turnover of staff. In addition, meal preparation and serving practices are often quite different from schools' practices. In some instances the children themselves assist in preparing meals, and family style meal service is quite common. In these situations, production records may not exist or may be inadequate to enable the State reviewer to conduct an independent nutrition analysis. Moreover, correctional facilities which include both children and adults will frequently not have separate production records for the meals served to children. Finally, the frequent turnover of RCCI staff can undermine the SA's efforts to provide technical assistance and achieve corrective action.

For these reasons, reviewers must exercise their judgment and be flexible when conducting reviews of RCCIs and developing and monitoring corrective action. In particular, reviewers may find that the standard review instruments are not always appropriate for RCCI operations, and it may be necessary to use an alternative to the standard analysis of menus and production records. For example, a reviewer may decide to analyze the foods being prepared on the day of the review, as well as other records that help document food service activity during a recent period, and make a judgment about the overall food service based on these results.

This flexibility for reviewing RCCIs is consistent with the intent of providing reasonable approaches for the variety of schools and institutions that participate in the Child Nutrition Programs. Nevertheless, it must be recognized that RCCIs are, in many situations, the sole providers of meals to their enrolled children and, as a consequence, must recognize and assume the complete responsibility for providing an adequate diet for these children. While we consider that flexibility is important, the reviewer must keep in mind the institution's responsibility to ensure proper nutrition for the child.

Please contact our office if you have any questions.



ANN C. DeGROAT
Regional Director
Child Nutrition Programs